

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**JENNIFER RAE GUNTER, an Oregon Elector;  
and CHRISTINA LYNN MILCAREK, an Oregon Elector;  
and CHELSEA ANNE WEBER, an Oregon Elector**

Plaintiff(s),

Case No.: **3:22-CV-1252-MO**

v.

**OPPOSITION TO MOTION  
FOR EXTENSION OF TIME**

**SHEMIA FAGAN, in her individual capacity  
and as Secretary of State for the State of  
Oregon**

Defendant()

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**OPPOSITION TO MOTION FOR EXTENSION OF TIME**

LR 7-2 CERTIFICATION The undersigned hereby certifies that this opposition to the filed motion of time extension complies with the applicable word count limitation because it contains 520 words including headings, footnotes, and quotations, but excluding the caption, and signature block.

1. Due to the irreparable damage plaintiffs have endured and are still enduring daily surrounding the First Amended Complaint we must oppose counsel's motion.

2. As plaintiffs can respect counsel has commitments in his daily profession within the DOJ such as this, however case load and litigation should not negate a timely filed response within court rules for the damages that have been placed upon plaintiffs causing a pro se suit to be filed in Federal court to preserve plaintiffs' constitutional rights outlined in the first amended complaint.
3. There is an extreme urgency to the nature of this complaint as we are approaching another election with machines that are in use, that purportedly are not accredited. Which violate our rights as set forth in the First Amended Complaint.
4. Plaintiffs would assume defense counsel and Ms. Fagan would also agree to the **urgency** of this matter that affects both Plaintiffs, and defendants, and all Oregon voters, to move quickly to clear up any issues surrounding elections which is an integral part of our state functions. A Motion for an extension of time seems not to reflect that urgency for the irreparable damages caused to the 3 plaintiffs and **many** Oregonians.
5. With that said, this honorable court may rule in favor of the motion for time extension for the defense and may deny plaintiffs filed opposition. Defense extends and inflicts more damages through time. Time is simply something that is of upmost value. Time cannot be regained or repaired.
  - a. Inflictions through delay further damage plaintiff's rights for a speedy redress.
6. The Oregon Attorney General's office has a large **vast majority** of resources and assistance at their disposal, as well as experience in litigation. Counsels reply to the

original complaint filed on August 24<sup>th</sup>, 2022, was 19 days ago and was due **this week**, on the 14<sup>th</sup>. No such extension has ever been suggested or implied. Plaintiffs assume counsel knew their work schedule.

- a. Such luxuries of in-office legal assistants are not afforded to plaintiffs for resources leaving them at a disadvantage and still leaving them waiting with the further irreparable damage of time through delays.

For these reasons set forth in this opposition plaintiffs **strongly** oppose counsels' motion for time extension to reply.

Respectfully submitted September 12<sup>th</sup>, 2022.

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